

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

· Caption in Compliance with D.N.J. LBR 9004-1(b)

Blumberg & Rosenberg, PA  
Henry A. Loeb, Esq. ID#028391982  
27 East High Street, Suite B  
Somerville, NJ 08876  
phone: 908-526-5400  
fax: 908-725-0417  
email: henryaloeb@yahoo.com

In Re:

Robyn Woodson

Case No.: 15-32423-VFP

Chapter: 13

Hearing Date: 8/27/19 @ 10:00 a.m.

Judge: Vincent F. Paplia

**NOTICE OF MOTION TO VACATE DISMISSAL OF CASE AND REQUEST FOR WAIVER  
OF STAY IMPOSED BY B.R. §§4001(a)(3), 6004 (h) or 6006(d)**

Henry A. Loeb, Esq. has filed papers with the court to Vacate Dismissal of Case and Request for Waiver of Stay Imposed by B.R. §§4001(a)(3), 6004 (h) or 6006(d).

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than 7 days prior to the hearing date.

Hearing Date: August 27, 2019

Hearing Time: 10:00 a.m.

Hearing Location: MLK Jr. Federal Building  
50 Walnut Street  
Newark, NJ 07102

Courtroom Number: 3B

If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

You must also mail a copy of your response to:

Marie-Ann Greenberg, Chapter 13 Trustee

30 Two Bridges Road

Suite 330

Fairfield, NJ 07004

If you, or your attorney, do not take the steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: July 29, 2019

/s/ Henry A. Loeb, Esq.

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Chapter: 13

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**CERTIFICATION OF ROBYN WOODSON**

I, Robyn Woodson, the Debtor in the above captioned case, submits this Certification in support of the Motion for Vacating the Dismissal of the Case filed by me on July 29, 2019

1. I suffer from Lupus, an autoimmune disease, and have had episodic or flare up symptoms since on or about 2005.
2. On or about late 2018 into February 2019, I suffered severe Lupus symptoms which caused me to be temporarily unable to continue my employment.

3. As a consequence of this loss of employment I fell behind in my payments outside my Chapter 13 Plan to the two secured creditors being paid arrears in my Chapter 13 Plan and thereafter with my Chapter 13 Plan payments.
4. After the symptoms from the Lupus flare up went into remission, I returned to my employment.
5. I resolved both of my defaults with M & T Bank (formerly Hudson City), accepting a repayment plan and J.P. Morgan Chase, receiving full payment of my arrears.
6. I learned my case was dismissed when I attempted in mid-June 2019 to make my regular bankruptcy monthly payment to the trustee but it was rejected.
7. I currently have the money in hand to pay May, June, July and August payments in the total amount of \$4,596.00 (@\$1,149.00/month).
8. But for the Lupus flare up I would not have defaulted in my payments and I have diligently endeavored to be able to be current with my Chapter 13 Plan.

I certify under penalty of perjury that the above is true.

Date: July 29, 2019

/s/ Robyn Woodson  
Robyn Woodson

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**STATEMENT AS TO WHY NO BRIEF IS NECESSARY**

In accordance with D.N.J. LBR 9013-1(a)(3), it is respectfully submitted that no brief is necessary in the court's consideration of this motion, as it does not involve complex issues of law.

Date: July 29, 2019

/s/ Henry A. Loeb, Esq.

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**CERTIFICATION OF SERVICE**

1. I, Henry A. Loeb, Esq.:

☒ represent Robyn Woodson in this matter.

☐ am the secretary/paralegal for \_\_\_\_\_, who represents  
\_\_\_\_\_ in this matter.

☐ am the \_\_\_\_\_ in this case and am representing myself.

2. On July 29, 2019, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

- ☒ Notice of Motion to Vacate Dismissal of Case and Request for Waiver of Stay Imposed by B.R. §§4001(a)(3), 6004 (h) or 6006(d)
- ☒ Certification in Support of Motion to Vacate Dismissal of Case and Request for Waiver of Stay Imposed by B.R. §§4001(a)(3), 6004 (h) or 6006(d)
- ☒ Statement as to Why No Brief is Necessary
- ☒ Proposed Order Granting Motion to Vacate Dismissal of Case and Request for Waiver of Stay Imposed by B.R. §§4001(a)(3), 6004 (h) or 6006(d)
- ☐ Other \_\_\_\_\_

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: July 29, 2019

/s/ Henry A. Loeb, Esq.

Henry A. Loeb, Esq.

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Marie-Ann Greenberg, Trustee	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
Elysa D. Bergenfeld, Esq. Ansell Grimm & Aaron PC 214 Carnegie Center, Suite 112 Princeton, NJ 08540	Atty for Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
KML Law Group 216 Haddon Avenue, Suite 406 Westmont, NJ 08108	Secured Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
Office of the United States Trustee One Newark Center 1085 Raymond Boulevard Suite 2100 Newark, NJ 07102	US Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
Phillip Raymond, Esq. McCalla Raymer Leibert Pierce, LLC 485 F US Highway 1 South Suite 300 Iselin, NJ 08830	Secured Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)



Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Bank of America 1800 Tupo Canyon Road Simi Valley, CA 93063	Secured Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
NJ Law & Public Safety Credit Union 225 E. State Street, Suite 1 Trenton, NJ 08608	Secured Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
Society Hill @ University Heights I c/o mem property management corporation 65 Challenger Road, Ridgefield Park, NJ 07660	Secured Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
Society Hill @ University Heights III c/o mem property management corporation 65 Challenger Road, Ridgefield Park, NJ 07660	Secured Creditor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input type="checkbox"/> Other _____ (As authorized by the court or rule. Cite the rule if applicable.)

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**ORDER GRANTING VACATING OF DISMISSAL OF CASE**

The relief set forth on the following pages is **ORDERED**.

*[Leave the rest of this page blank]*

The debtor having filed a motion to vacate dismissal of case; and the court having considered any objections filed; and for good cause shown; it is

\_\_\_\_\_ ORDERED that the motion is granted and the order dismissing case is vacated effective on the date of this order. No actions taken during the period this case was dismissed were subject to the automatic stay or other provisions of the Bankruptcy Code;

IT IS FURTHER ORDERED that any deadline unexpired at the time of dismissal is nullified and reset as follows. Creditors and/or parties in interest have:

1. until the original deadline fixed by the court to file a complaint to object to the debtor's discharge or dischargeability of certain debts, or 60 days from the date of this Order, whichever is later;
2. until the original deadline fixed by the court to file a proof of claim or required supplement, or 60 days from the date of this Order, whichever is later; and
3. until the original deadline fixed by the court to object to exemptions, or 30 days from the date of this Order, whichever is later.

IT IS FURTHER ORDERED that if the meeting of creditors has not been concluded, the debtor must contact the case trustee to schedule a new date for the meeting, and must provide 21 days' notice under Bankruptcy Rule 2002(a)(1) of the new date to all creditors and parties in interest.

IT IS FURTHER ORDERED that if this is a chapter 13 case, and the debtor's plan has not been confirmed, the confirmation hearing is rescheduled to \_\_\_\_\_ at \_\_\_\_\_.

\_\_\_\_\_ ORDERED that the motion to vacate order dismissing case is denied.

IT IS FURTHER ORDERED that whether the motion is granted or denied, the debtor must, within 3 days of the date of this Order, serve all creditors and parties in interest with a copy of this Order and immediately thereafter file Local Form Certification of Service.